

Privacy Notice for U.S. Residents

Effective Date: January 1, 2020

Last Updated: February 1, 2026

This **Privacy Notice for U.S. Residents** supplements the information contained in HH Global Ltd.'s [Privacy and Cookies Policy](#) and applies solely to all visitors, users, consumers, and others who reside in the United States, including California ("consumers" or "you"). We adopt this notice to comply with privacy laws in the United States, including the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 ("CPRA") ([Cal. Civ. Code §§ 1798.100 to 1798.199.100](#); [Cal. Code Regs. Tit. 11, §§ 7000 to 7304](#)) (collectively, "CCPA") and any amendments, and any terms defined in the CCPA have the same meaning when used in this notice.

Information we collect

This policy describes how we collect, process, retain and disclose information about you that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household ("personal information"). HH Global, including the website, www.hhglobal.com, has collected certain categories of personal information from consumers within the last twelve (12) months. For purposes of illustration, the chart below provides examples of personal information within each category, some of which may not have been specifically collected by HH Global.

Category	Examples	Collected	Purpose	Third Party Disclosures	Retention Period
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address,	YES	(a) Performance of a contract (b) Necessary for our legitimate interests	(a) Print production vendors (b) Promotional item vendors	Records are retained pursuant to contractual requirements with our clients and are only retained for as long as we have a legal or business purpose for the

	company, other similar identifiers that permits online or physical contact with a specific individual, or information about a user that the website or online service collects online from the user and maintains in personally identifiable form, combined with one of the other elements.		(c) Necessary to comply with a legal obligation	(c) Fulfillment center vendors	records. Depending on the client, we may be required to retain customer data for up to 7 years following the termination of the business relationship.
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	First and last name, signature, physical characteristics or description, home or other physical address, home telephone numbers or personal cellular numbers. Some personal information included in this category may overlap with other categories.	YES	(a) Performance of a contract (b) Necessary for our legitimate interests (c) Necessary to comply with a legal obligation	(a) Print production vendors (b) Promotional item vendors (c) Fulfillment center vendors	Records are retained pursuant to contractual requirements with our clients and are only retained for as long as we have a legal or business purpose for the records. Depending on the client, we may be required to retain customer data for up to 7 years following the termination of the business relationship.
C. Protected classification characteristics under	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or	NO	N/A	N/A	N/A

California or federal law.	creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).				
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO	N/A	N/A	N/A
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints,	NO	N/A	N/A	N/A

	faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.				
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES	(a) Necessary for our legitimate interests (b) Necessary to comply with a legal obligation	(a) Analytics and business intelligence vendors	26 months from the time of collection
G. Geolocation data.	Proximity of physical location based on IP address or movements.	YES	(a) Necessary for our legitimate interests (b) Necessary to comply with a legal obligation	(a) Analytics and business intelligence vendors	26 months from the time of collection
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO	N/A	N/A	N/A
I. Professional or employment-	Current or past job history or performance evaluations.	NO	N/A	N/A	N/A

related information.					
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO	N/A	N/A	N/A
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO	N/A	N/A	N/A
L. Sensitive Personal Information	Personal information that reveals a consumer's: Government ID; account log-in, financial accounts information in combination with any	NO	N/A	N/A	N/A

	required access credentials; precise geolocation; racial or ethnic origin; religious or philosophical beliefs; union membership; genetic data; biometric information (for the purpose of uniquely identifying a consumer; health, sex life, or sexual orientation information.				
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HH Global obtains the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete or by communicating with us by post, phone, email or otherwise.
- Indirectly from you. For example, from observing your actions on our website.
- Third parties. For example, from our clients who rely upon us for executing marketing plans, or we may collect publicly available information about you or information from our financial and transaction data partners.

For each category of personal information above, HH Global collects the information for the following business or commercial purposes(s):

- To perform a contract with you or our clients.
- For our necessary legitimate interests. For example, to recover debts due to us, to keep records updated and study how customers interact with our products/services, for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise, to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy, to define types of customers for our products and services, to

keep our website updated and relevant, to develop our business and to inform our marketing strategy, or to develop our products/services and grow our business.

- To comply with legal obligations.

Use of personal information

We may use or disclose the personal information we collect for one or more of the following business purposes:

- Where we need to perform the contract we are about to enter into or have entered into with our clients.
- Where it is necessary for our legitimate interests (or those of a third party) and it is not disproportionate to your interests and fundamental rights.
- Where we need to comply with a legal or regulatory obligation.
- To manage our relationship with you, which may include providing support, personalizing, and developing our website, marketing, products, and services for you.
- To process your requests, purchases, transactions, and payments and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To help maintain the safety, security, and integrity of our website, products and services, databases and other technology assets, and business.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in applicable law.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of HH Global's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by HH Global about our users is among the assets transferred.

HH Global will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Disclosing personal information to third parties

HH Global may disclose your personal information to a third party for a business purpose, for example, we may disclose your personal information to our print production vendors to facilitate the sending of promotional materials from our clients.

When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

We disclose your personal information with our service providers for business purposes as noted in the chart above.

Sales and “Sharing” of personal information

In the preceding twelve (12) months, HH Global has not sold personal information.

In the preceding twelve (12) months, HH Global has not shared your personal information for targeted or cross contextual behavioral advertising.

Your rights and choices

You may have specific rights regarding your personal information. This section describes the rights you may have and explains how to exercise those rights. It also provides you with information about your right to appeal if we deny your request.

Access to specific information and data portability rights

You may have the right to request that HH Global disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights), we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we disclosed your personal information for a business purpose, identification of the personal information categories that each category of recipient obtained.

Deletion request rights

You have the right to request that HH Global delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see Exercising

Access, Data Portability, and Deletion Rights), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies. If an exception applies, we will advise you of the applicable exception and the reason for denying your request.

Correction request rights

You have the right to request that HH Global correct any inaccurate personal information we may hold about you. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights), we will use commercially reasonable efforts to correct inaccurate personal information, taking into the account the nature of the personal information and the purpose for our processing.

Exercising access, data portability, and deletion rights; Designating an authorized agent

To exercise the access, data portability, and deletion rights described above, or to designate an authorized agent, please submit a verifiable consumer request to us by either:

- Calling us toll free: 866-475-5652.
- Visiting www.hhglobal.com.
- Sending us an email: Data.Protection@www.hhglobal.com.
- Filling out an interactive [web form](#), found here.

Only you or an authorized agent may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. To designate an authorized agent to make a request on your behalf, please complete the following form [here](#) or provide us with a power of attorney or other legally binding written document signed by you and identifying your agent. We may also verify the identity of your designated agent. The request may be provided to us via email at Data.Protection@www.hhglobal.com or via mail at the address listed in the Contact Information section.

The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, usually by sending us an email from the account in our records. We may also ask for your name, email and/or business contact information to verify your identity.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We will use the information you provide to verify your request against the records we maintain. We will not use the information you provide to verify your request for any other purpose. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

You may appeal a denial of your request by emailing us at Data.Protection@www.hhglobal.com.

Personal Information Opt-Out and Opt-In Rights

We do not sell or share personal information as defined under the California Consumer Privacy Act (CCPA) and the California Privacy Rights Act (CPRA). Therefore, the ‘Do Not Sell or Share My Personal Information’ right does not apply to our services.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Other California Privacy Rights

California’s “Shine the Light” law (Civil Code Section § 1798.83) permits users of our website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to Data.Protection@www.hhglobal.com or write us at: General Counsel, Americas, 203 N. LaSalle, Suite 1800, Chicago, Illinois 60601.

Changes to our privacy notice

HH Global reserves the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the website and update the notice’s effective date. Your continued use of our website following the posting of changes constitutes your acceptance of such changes.

Contact information

If you have any questions or comments about this notice, the ways in which HH Global collects and uses your information described herein and in the [Privacy and Cookies Policy](#), your choices and rights regarding such use, or wish to exercise your rights under the law, please do not hesitate to contact our General Counsel at:

Toll Free Phone: 866-475-5652

Website: www.hhglobal.com

Email: Data.Protection@www.hhglobal.com

Postal Address:

HH Associates U.S., Inc.
Attn: General Counsel
203 N. LaSalle, Suite 1800
Chicago, Illinois, 60601

Interactive Web Form: [Web Form](#)